

May 23, 2019

The Honorable Connie M. Leyva  
Chair, Senate Education Committee  
State Capitol, Room 2083  
Sacramento, CA 95814

Dear Senator Leyva:

I am writing to share my serious concerns regarding Assembly Bill 751, the “Pathways to College Act.” For over 35 years, I served on the faculty of the Stanford University Graduate School of Education. I am recently retired, now the Jacks Family Professor of Education, Emeritus. I have a Ph.D. from the University of Chicago, Department of Education, with a concentration in measurement, evaluation, and statistical analysis. I am a recognized expert in educational research, and in particular in educational testing and measurement, as shown on my Curriculum Vitae (available at <https://people.stanford.edu/haertel/curriculum-vitae>).

My history with testing issues in the State of California reaches back to membership on Technical Advisory Committee for the California Assessment Program in the 1980s, and I served on the Advisory Committee for the Public Schools Accountability Act of 1999 from the time that committee was first formed until it ceased to function in 2015. In 2007, I received the Lifetime Achievement Award from the California Educational Research Association. I currently serve on the Technical Design Group working with the CDE’s Analysis, Measurement, and Accountability Reporting Division, and I also serve on the Technical Advisory Committee for the Smarter Balanced Assessment Consortium. In this letter, I am expressing my own views. I am not representing the views of Stanford University.

I am deeply concerned about the implications of AB 751 for California’s school accountability system and ultimately, for the quality of education offered to public-school students in our great state of California. There is a natural desire to reduce testing burden, and on the face of it, using the same test for multiple purposes seems like a sensible solution. Since many high school students are already taking the ACT or the SAT, for example, why should they also have to take the 11th-grade Smarter Balanced assessments? Moreover, encouraging more students to take college entrance exams seems like a good thing—As suggested by the name of the “Pathways to College Act,” mandating one of these tests might encourage college application and college enrollment. In addition, high school students might be more motivated to try hard on a college entrance exam than on Smarter Balanced assessments for which they perceived fewer personal consequences.

As a psychometrician who has devoted my entire professional career to understanding and improving achievement tests and accountability testing programs, I certainly share the concerns of policy makers and the public over testing burden, access to higher education, and student motivation, but despite these concerns, I believe that AB 751 is very unwise. The authors of the bill were clearly thoughtful and well-intentioned, having included numerous sensible requirements concerning rigor, coverage, inclusiveness, score reporting, and other matters, but as a practical matter, these paper requirements would be quite easy to satisfy. In

the end, what the bill comes down to is a proposal to take two (or more) very different examinations, developed according to different specifications to serve different purposes, administered under different conditions (including different motivational contexts), and then to treat the resulting scores as interchangeable. We may wish such a thing were possible, but it simply cannot be done. Methods for expressing scores from different tests on a common scale, or for using and interpreting them as if interchangeable, fall far short of providing the degree of comparability California's state-of-the-art school accountability system would require.

I cannot help but think back to the short-lived "Pupil Testing Incentive Program" (PTIP) enacted in California over 20 years ago, after the demise of the California Learning Assessment System (CLAS) and before the enactment of the Standardized Testing and Reporting (STAR) program. PTIP was supposed to, in fact was mandated to, produce comparable scores across a menu of approved off-the-shelf achievement tests that districts could choose from. I was among the testing experts who were concerned at that time that the legislation's aspirations had gotten out ahead of what the testing field would be able to deliver, and that in fact proved to be the case. The effort was abandoned within two years. I am afraid that despite its good intentions, AB 751 likewise reaches well beyond the range of technical feasibility.

The comparability requirements included in AB 751 might sound rigorous, but in practice, it would be very easy to satisfy "alignment," depth-and-breadth, and similar technical criteria despite material differences in item formats, content coverage and weighting, and ultimately in the constructs assessed by the Smarter Balanced tests versus some college entrance exam. (In the PTIP program, a seemingly rigorous test review process was in practice easily circumvented.) Scores on different tests have different meanings, even if the names of the tests are the same or similar, even if the tests are nominally aligned to the same content frameworks. Even if it were possible to scale the scores from such different tests so as to provide adequate comparability at the level of individual students (which is far from guaranteed), when scores were aggregated to the level of schools, or demographic subgroups within schools, small biases and differences in score meaning, as well as differences in the tests' precision and error structures, would take on much greater importance, resulting in deeply flawed comparisons across schools participating in different testing regimes.

In addition, many colleges and universities in California have already agreed to accept specified performance levels on the Smarter Balanced tests as evidence that students can bypass remedial courses or waive co-requisites. As Smarter Balanced scores are increasingly accepted as evidence of readiness by California's community colleges and CSU institutions, 11th-grade Smarter Balanced scores will become even more valuable and meaningful for our high school students. AB 751 would deprive students in opt-out districts not only of valuable information concerning their own college readiness, but also of tangible evidence they could otherwise use to jumpstart their college careers.

Finally, I am seriously concerned with "wash-back" or "up-stream" effects of abandoning the Smarter Balanced assessments for high school students. While we can never rely solely on incentives to "teach to the test" as a tool for curriculum reform, we can at least choose tests

with the virtue that sound test preparation is also sound instruction. In 2001, University of California President Richard C. Atkinson proposed that the UC system stop using the SAT-I for college admissions and instead use a mix of achievement tests, based in large part on evidence that widespread SAT-I test preparation was of little educational value. Preparation for achievement tests (the SAT-II exams at that time) was believed to have greater pedagogical value. There are striking parallels in the use of the Smarter Balanced assessments versus college entrance tests today. The Smarter Balanced tests have been designed, from the ground up, with the goal of incentivizing sound classroom instruction. This is “in the DNA” for Smarter Balanced. To my knowledge, the same simply cannot be said of any of the college entrance exams envisioned in Section 1111(b)(2)(H) of ESSA, or other similar examinations that AB 751 might make available.

I hope that these remarks are helpful to you in your deliberations.

With best regards,

A handwritten signature in black ink that reads "Edward Haertel". The signature is written in a cursive, flowing style.

Edward H. Haertel, Ph.D.  
Jacks Professor of Education, Emeritus  
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cc: Lynn Lorber  
Staff Director, Senate Education Committee

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